

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re MICHAEL STAPLETON ASSOCIATES,
LTD employment litigation

Master File No. 1:17-cv-05468 (GWG)

**DECLARATION OF FRANCIS M. CURRAN REGARDING THE FILING OF
COMPLETE EXHIBITS TO THE DECLARATION OF PAUL H. ALOE IN SUPPORT
OF JOINT MOTION FOR FINAL APPROVAL OF SETTLEMENT AND PLAINTIFFS'
COUNSEL'S FEES AND EXPENSES**

Francis M. Curran, an attorney admitted to practice in the United States District Court for the Southern District of New York and in the courts of the State of New York, declares and affirms under penalties of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney with the law firm of Kudman Trachten Aloe LLP ("KTA"), lead counsel for the certified plaintiff class and collective in this matter. I have personal notice of the matters set forth in this declaration and, if called upon as a witness, I would and could competently and truthfully testify to these matters under penalty of perjury.

2. I submit this declaration in order to file complete copies of Exhibits 3 and 6 to the Declaration of Paul H. Aloe dated July 18, 2019 ("Aloe Decl."). Due to an error in scanning by the undersigned, some pages were inadvertently omitted from the as-filed copies of those Exhibits.

3. The contemporaneous detailed time records associated with this matter, organized by attorney and paralegal, were attached to the Aloe Decl. as Exhibit 3. Unfortunately, several pages were omitted from the as-filed Exhibit. The page showing the total number of hours recorded by Douglas J. Weiner (386) and his hourly rate (\$450) was omitted; it is now included on Corrected Exhibit 3. Similarly, the pages showing the complete time records of Robert J. Cowan and Katie

McGregor were omitted. They are also now included in Corrected Exhibit 3, which is attached hereto.

4. Notwithstanding that there were pages from the time records inadvertently omitted from Exhibit 3, the lodestar amount noted in paragraph 87 of the Aloe Decl. (\$1,245,396.25) remains unchanged.

5. As noted in paragraph 80 of the Aloe Decl., David I. Aboulafia has been personally retained, by written agreement, by over 200 of the Class and Collective Members in this action. A list of those clients and one of these 200-plus retainer agreements were attached as Composite Exhibit 6 to the Aloe Decl.

6. Mr. Aboulafia's clients were listed in alphabetical order. The as-filed list was missing two pages, and omitted clients listed between Francis Mottola and Peter Vega. A complete alphabetical list of clients and the sample retainer agreement are attached hereto as Corrected Composite Exhibit 6.

I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct, except as to those statements made upon information and belief, and as to those matters, I believe them to be true.

Dated: New York, New York
August 6, 2019

KUDMAN TRACHTEN ALOE LLP

By: 

Francis M. Curran

350 Fifth Avenue, 68th Floor
New York, New York 10118
(212) 868-1010
(212) 868-0013 (fax)

Lead Counsel for the Class and Collective